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DELAWARE TRUST COMPANY, as TCEH	:
First Lien Indenture Trustee,	:
	:
Plaintiffs,	:
	:
v.	:
	Civil Action No. 15-CV-2883
	(PAE)(FM)
WILMINGTON TRUST, N.A., as First Lien	:
Collateral Agent and First Lien Administrative	:
Agent, and THE BANK OF NEW YORK	:
MELLON TRUST COMPANY, N.A., as	:
Escrow Agent,	:
	:
Defendants.	:
	:
	:
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Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned counsel for Defendant Wilmington Trust, N.A. hereby states that Wilmington Trust, N.A. is a wholly-owned subsidiary of Wilmington Trust Corporation, which is a wholly owned subsidiary of M&T Bank Corporation. M&T Bank Corporation is a publicly-traded company whose shares are traded on the New York Stock Exchange, and no publicly held company owns 10% or more of M&T Bank Corporation's shares.

Dated: New York, New York

April 15, 2015

Respectfully submitted,

O'MELVENY & MYERS LLP

By: /s/ Jonathan Rosenberg

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*Attorneys for Defendant Wilmington
Trust, N.A., in its capacity as
First Lien Administrative Agent*